## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Alexandria Division

ROSY GIRON DE REYES, et al.,

Plaintiffs,

VS.

WAPLES MOBILE HOME PARK LIMITED PARTNERSHIP, et al.,

Defendants.

Civ. No. 1:16-cv-00563 (LO/TCB)

## PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz ("Plaintiffs") respectfully move this Court for approval to file under seal Exhibits 1, 2 and 3 to Plaintiffs' Motion to Amend Exhibit List and Witness List. The exhibits consist of documents Defendants designated confidential pursuant to the Protective Order (Dkt. 45); specifically, documents that identify the names of Defendants' tenants who are not parties to this action.

In support of this Motion, Plaintiffs are submitting a non-confidential Memorandum, along with an appropriate Notice and Proposed Order.

[signatures on following page]

Respectfully submitted, Date: June 4, 2021

\_\_\_\_//s//\_\_\_\_

LEGAL AID JUSTICE CENTER Simon Sandoval-Moshenberg, VSB #77110 simon@justice4all.org Nady Peralta, VSB #91630 nady@justice4all.org Granville Clayton Warner, VSB #24957 cwarner@justice4all.org 6066 Leesburg Pike, Suite 520 Falls Church, VA 22041

Phone: (703) 778-3450 Fax: (703) 778-3454

## QUINN EMANUEL URQUHART & SULLIVAN, LLP

Kaiyeu Kevin Chu, VSB #85746

kevinchu@quinnemanuel.com

Matthew Traupman (pro hac vice)

matthewtraupman@quinnemanuel.com

1300 I Street NW, Suite 900

Washington, District of Columbia 20005

Phone: (202) 538 8000

Phone: (202) 538-8000 Fax: (202) 538-8100

Counsel for Plaintiffs

## **Certificate of Service**

I hereby certify that on this 4th day of June, 2021, I caused the foregoing, along with all attachments thereto, to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing (NEF) to all counsel of record.

\_\_\_\_\_//s//\_\_\_\_

Simon Sandoval-Moshenberg (VSB No. 77110) simon@justice4all.org LEGAL AID JUSTICE CENTER 6066 Leesburg Pike, Suite 520 Falls Church, VA 22041

Tel: (703) 720-5605 Fax: (703) 778-3454